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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	NO.
v.	3-16CR-319-L
JASON LEE RANDALL	

INDICTMENT

The Grand Jury Charges:

Count One
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a) and (e))

On or about June 2, 2016, in the Dallas Division of the Northern District of Texas and elsewhere, **Jason Lee Randall**, the defendant, used, persuaded, induced, enticed, and knowingly attempted to use, persuade, induce, and entice Jane Doe, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by using an alias, that is, pretending to be a minor child, to ask Jane Doe to create a visual depiction of Jane Doe, a minor, engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, who then sent the visual depiction to the defendant. Specifically, Jane Doe sent the following video to the defendant's alias using the internet:

Video File	Description
373c0d57-d0b8-402b-932d-56d7e49dfd54.mp4	A video file that shows Jane Doe, a minor female child, who is nude from the waist down. The video file shows Jane Doe rubbing her genitals with her hand.

Prior to June 2, 2016, **Jason Lee Randall**, the defendant, after pleas of guilty, was sentenced to ten years deferred adjudication, in the Criminal District Court #7 of Dallas County, Texas, on September 17, 2009, for the felony offenses of possession of child pornography in case numbers F-0601192-Y, F-0601193-Y, F-0601194-Y, F-0601195-Y, and F-0601196-Y, in violation of Texas Penal Code Section 43.26, a state offense for possession of child pornography. On January 24, 2012, the defendant's probation was revoked in the above cases and the defendant served two years in confinement.

In violation of 18 U.S.C. § 2251(a) and (e).

Count Two
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about June 3, 2016, in the Dallas Division of the Northern District of Texas, **Jason Lee Randall**, the defendant, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, he used the Internet and his cellular phone to send and transmit files of minors engaged in sexually explicit conduct and the lewd and lascivious exhibition of the genitals of minors, as defined in 18 U.S.C. § 2256, including the following described video file:

File Name:	Description:
0e8b6e12-346e-442a-803c-be4295da3b2d.mp4	Video file of a prepubescent female child who is nude from the waist down. During the video, the child uses her hands to spread her genitals.

Prior to June 3, 2016, **Jason Lee Randall**, the defendant, after pleas of guilty, was sentenced to ten years deferred adjudication, in the Criminal District Court #7 of Dallas County, Texas, on September 17, 2009, for the felony offenses of possession of child pornography in case numbers F-0601192-Y, F-0601193-Y, F-0601194-Y, F-0601195-Y, and F-0601196-Y, in violation of Texas Penal Code Section 43.26, a state offense for possession of child pornography. On January 24, 2012, the defendant's probation was revoked in the above cases and the defendant served two years in confinement.

In violation of 18 U.S.C. § 2252A(a)(1).

Count Three
Possession of Prepubescent Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(5)(B))

On or about June 3, 2016, in the Dallas Division of the Northern District of Texas, **Jason Lee Randall**, the defendant, knowingly possessed material which contains videos of child pornography, as defined in 18 U.S.C. § 2256(8), that involved prepubescent minors or minors who had not attained 12 years of age, and which had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer or was produced using materials that had been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer. Included on his ZTE cellular telephone are the following videos:

File Name:	**Description:**
cb7a6e5a-e611-4766-9a5f-121d52e81dd8.mp4	A video file showing an infant child. During the video, an adult male's penis is inserted into the mouth of the infant.
f6aca4b0-577b-420b-80b4-aa5e4a3a9f4b.mp4	A video file showing an infant female child. During the video, an adult male rubs his penis on the genitals and anus of the infant female child.
c967ce00-3ab9-4b4d-8a74-fc7d90fd015c.mp4	A video file showing an infant child. During the video, an adult male's penis is inserted into the mouth of the infant.

Prior to June 3, 2016, **Jason Lee Randall**, the defendant, after pleas of guilty, was sentenced to ten years deferred adjudication, in the Criminal District Court #7 of Dallas County, Texas, on September 17, 2009, for the felony offenses of possession of child pornography in case numbers F-0601192-Y, F-0601193-Y, F-0601194-Y, F-0601195-Y, and F-0601196-Y, in violation of Texas Penal Code Section 43.26, a state offense for possession of child pornography. On January 24, 2012, the defendant's probation was revoked in the above cases and the defendant served two years in confinement.

In violation of 18 U.S.C. § 2252A(a)(5)(B).

Count Four
Penalties for Registered Sex Offenders
(Violation of 18 U.S.C. § 2260A)

On or about June 2 through June 3, 2016, in the Northern District of Texas, and elsewhere, **Jason Lee Randall**, the defendant, being required by state and federal law to register as a sex offender, did commit a felony offense involving a minor in violation of 18 U.S.C. § 2251(a), in that he used, persuaded, induced and enticed, Jane Doe, a person under the age of eighteen years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct.

Prior to June 2, 2016, **Jason Lee Randall**, the defendant, after pleas of guilty, was sentenced to ten years deferred adjudication, in the Criminal District Court #7 of Dallas County, Texas, on September 17, 2009, for the felony offenses of possession of child pornography in case numbers F-0601192-Y, F-0601193-Y, F-0601194-Y, F-0601195-Y, and F-0601196-Y, in violation of Texas Penal Code Section 43.26, a state offense for possession of child pornography. On January 24, 2012, the defendant's probation was revoked in the above cases and the defendant served two years in confinement.

In violation of 18 U.S.C. § 2260A.

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any of the offenses alleged in Count One, Count Two, and Count Three, and pursuant to 18 U.S.C. § 2253(a), **Jason Lee Randall**, the defendant, shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. §§ 2252A, and 2252, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property. The above-referenced property subject to forfeiture from the previously-mentioned defendant includes, but is not limited to, any interest in the following: a ZTE Z812 cellular phone bearing serial number 322252661084, including an incorporated 16 gigabyte micro memory card.

A TRUE BILL

FOREPERSON

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FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

JASON LEE RANDALL

INDICTMENT

18 U.S.C. § 2251(a) and (e)
Production of Child Pornography

18 U.S.C. § 2252A(a)(1)
Transporting and Shipping Child Pornography

18 U.S.C. § 2252A(a)(5)(B)
Possession of Prepubescent Child Pornography

18 U.S.C. § 2260A
Penalties for Registered Sex Offenders

18 U.S.C. § 2253
Forfeiture Notice

4 Counts

A true bill rendered

DALLAS FOREPERSON

Filed in open court this 20th day of July, 2016.

Warrant to be Issued - In State Custody

UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending